

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NicoleThompson, Steven McDonald & GlenishaRhone

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

City of New York, The New York City Police Department,
Police Officer Angel Rodriguez, Shield #12325, Sergeant Finegan,
Shield #UNKNOWN and Police Officers John and Jane Doe, "Shield
numbers UNKNOWN, all of the 43 precinct,

Jury Trial: Yes No
(check one)

*(In the space above enter the full name(s) of the defendant(s). If you
cannot fit the names of all of the defendants in the space provided,
please write "see attached" in the space above and attach an
additional sheet of paper with the full list of names. The names
listed in the above caption must be identical to those contained in
Part I. Addresses should not be included here.)*

I. Parties in this complaint:

A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name GlenishaRhone
Street Address 3620 Blackdog Ct.
County, City Tavares
State & Zip Code FL, 32778
Telephone Number 718-795-5914

B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name The City of New York, by Corporation Counsel
Street Address 100 Church Street

County, City New York, _____
 State & Zip Code NY, 10007, _____
 Telephone Number _____

Defendant No. 2 Name The New York City Police Department, _____
 Street Address 1 Police Plaza, _____
 County, City New York, _____
 State & Zip Code NY, 10007, _____
 Telephone Number _____

Defendant No. 3 Name PO Angel Rodriguez, NYPD, _____
 Street Address 1 Police Plaza, _____
 County, City Manhattan, N.Y. 10007, _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 4 Name Sergeant Finegan, NYPD, _____
 Street Address 1 Police Plaza, _____
 County, City Manhattan, _____
 State & Zip Code NY, 10007, _____
 Telephone Number _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (*check all that apply*)

Federal Questions Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? 42 USC Section 1983

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? _____
480 East 188 Street, Apt. 16J, Bronx, NY

B. What date and approximate time did the events giving rise to your claim(s) occur? _____
October 17, 2014, at approximately 4am

C. Facts: NYPD officers broke down the apartment door and arrested all of the occupants inside the apartment, including the Plaintiffs. The police were executing a search warrant for Laman McDonald, who was one of the people in the apartment. Inside Laman's bedroom was found various office equipment, including a desktop computer, monitor, printers, ID card printer, credit card skimmer and blank checks. They also recovered a gun concealed inside a box that was inside a bag at the bottom of a closet. Unless Laman told Plaintiffs that the office equipment was used for forgery-related purposes, they would have any reason to know that the office equipment was anything out of the ordinary. Re: the gun, unless Laman told the Plaintiffs that the gun was hidden where it was, they would have had no way of knowing that the gun was there. The only witnesses were the three Plaintiffs, Laman McDonald and Defendant police officers.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

Emotional and physical injuries and loss of employment.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. _____

Unspecified monetary damages

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 27th day of August, 2015.

Signature of Plaintiff Steven Goldman, Attorney for Plaintiffs

Mailing Address 190 E. 161 St.

Bronx, N.Y., 10451

Telephone Number 718-538-5743

ave one) 347-862-6408

Fax Number (if you have one) 347-862-6408

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20_____, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

Inmate Number